

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION**

UNITED STATES OF AMERICA

VS.

CAUSE NO. 3:21cr107-NBB

THOMAS IROKO AYODELE

MOTION FOR CONTINUANCE OF TRIAL

COMES NOW, Defendant, **Thomas Iroko Ayodele**, by and through his attorney of record, William F. Travis, and files this Motion for Continuance of Trial dates and all deadlines, and in support thereof, would respectfully show unto this Honorable Court the following facts and matters, to wit:

I.

The Defendant, Thomas Iroko Ayodele, was charged and indicted in the above-styled and numbered cause as filed on October 27, 2021. William F. Travis was appointed to represent Defendant Thomas Iroko Ayodele's interest in regard to this matter.

II.

This matter is set for trial on April 11, 2022 at 9:30 a.m., before Honorable Neal B. Biggers, Jr. in Oxford, Mississippi.

III.

Defendant's counsel would further show that Robert J. Mims, Assistant U.S. Attorney, has no objection to said continuance.

IV.

Due to the amount of discovery in this case, and the complexity of defending the criminal charges against Thomas Iroko Ayodele, additional time is also needed to investigate the case and prepare for his plea or trial, interview additional potential defense witnesses. Undersigned counsel will require additional time beyond the current trial date of April 11, 2022, to review the discovery and investigate all the factual allegations, locate and interview witnesses, conduct legal research and prepare and file pretrial motions, and prepare for trial. For these reasons, the defense request that the Court find:

a) The additional time requested is a reasonable period of delay, as counsel has requested more time to prepare for trial, to investigate the matter, to gather evidence material to the defense, and to consider possible defenses; and

b) The Government has produced discovery that will require additional time to review and conduct follow-up investigation. The case is sufficiently complex that it is unreasonable to expect adequate preparation for pretrial proceedings or the trial itself within the current trial schedule, as set forth in 18 U.S.C § 3161(h)(7)(B)(ii); and

c) The ends of justice will be best served by a continuance, and the ends of justice outweigh the best interests of the public and the defendant in a speedy trial, as set forth in 18 U.S.C § 3161(h)(7)(A); and

d) The additional time requested between the current trial date of April 11, 2022, and the new trial is necessary to provide counsel for the defendant reasonable time to prepare for trial considering counsel's schedule and all of the facts set forth above.

V.

This continuance is not requested for means of delay, but in the interest of justice in the defense of Thomas Iroko Ayodele.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully request a continuance of the trial setting and all deadlines in this matter from April 11, 2022, until a date and time in the future.

RESPECTUFLY SUBMITTED, this the 22nd of March, 2022.

THOMAS IROKO AYODELE,
Defendant

BY: /s/ William F. Travis
William F. Travis, MSB 8267

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing MOTION FOR CONTINUANCE has this day been electronically mailed to:

Robert J. Mims
robert.mims@usdoj.gov

THIS, the 22nd of March, 2022.

/s/ William F. Travis
William F. Travis, Certifying Attorney